



*United States Attorney
Eastern District of New York*

MKP/TH/MJL/KMT

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 30, 2019

By Hand and ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (S-1) (NGG) (VMS)

Dear Judge Garaufis:

The government respectfully requests an additional adjournment of one business day for its time to file its motion to admit enterprise evidence, from today until Monday, February 4, 2019. The government has conferred with counsel for all defendants and they do not object to the adjournment request. The government further requests that the opposition and reply deadlines be adjusted accordingly with defendants' response now due February 11, 2019 and any reply due February 18, 2019.

The parties also jointly request that the current deadlines for motions in limine be adjusted in light of the April 29, 2019 trial date. If convenient for the Court, the

parties propose, consistent with the Court's rules, that opening motions be due March 1, 2019, oppositions be due March 15, 2019 and any replies be due March 22, 2019. The parties intend to submit additional proposed deadlines prior to next week's status conference.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
Moir Kim Penza
Tanya Hajjar
Mark J. Lesko
Kevin Trowel
Assistant U.S. Attorneys
(718) 254-7000

cc: Counsel of record (by ECF)
Clerk of Court (NGG) (by ECF)